

Exhibit D

Page 1

VOL: I

PAGES: 1-103

EXHIBITS: None

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. No.: 3:22-cv-30059

* * * * *

LAUREN ROLLINS,

Plaintiff

-vs-

R STREET INSTITUTE,

Defendant

* * * * *

ZOOM DEPOSITION of MADISON T. ROLLINS, a
witness called on behalf of the Defendant,
before Jean Wiseman, a Notary Public and Certified
Shorthand Reporter within and for the Commonwealth
of Massachusetts, at the residence of MADISON T.
ROLLINS, Northampton, Massachusetts, on Thursday,
July 13, 2023, commencing at 10:04 a.m.

1 anymore was terrifying.

2 Q Did you ever have a conversation with your
3 mother about seeking treatment for what you
4 were observing as her emotional distress?

5 A I did. I asked her about it and I believe at
6 first she said that that was not something
7 that she was interested in.

8 Between the two of us we've spent a
9 pretty significant amount of time in our lives
10 in therapy for some childhood trauma. So
11 I think that she felt: Well, I've been there,
12 done that before. But eventually it was my
13 understanding that she did seek treatment, but
14 it wasn't until on a more recent scale. I am
15 aware that she's in therapy, but I'm not sure
16 when that started, but at first she was pretty
17 against it.

18 Q You believe that your mother is currently
19 receiving mental health treatment?

20 A She is, yes.

21 Q Do you know that for certain?

22 A I do. I Face Time her and she often tells me
23 that she's not answering because she's in
24 therapy.

1 Q Do you have an understanding of when that
2 therapy began?

3 A I do not. It's at least been a few months,
4 but I'm not exactly sure.

5 Q Okay. Has she indicated to you the purpose of
6 that therapy?

7 A Yes. We talked about it, when I -- you know,
8 truthfully, I was a little bit surprised that
9 she had decided to go, and she had said to me
10 that -- she was trying to convince me,
11 actually, because she thinks it's very
12 helpful. It helps her work through anything,
13 from childhood trauma to the breakup, to
14 losing her job. I think that it has
15 definitely helped her outlook on things.

16 Q So you recall your mother speaking about the
17 value and benefit that she was deriving from
18 therapy; is that right?

19 A Yes, and that's -- she's been saying she's an
20 advocate for therapy now, which she certainly
21 wasn't before.

22 Q And when you say before, she wasn't an
23 advocate for therapy in the aftermath of her
24 termination?

DEPOSITION ERRATA SHEET

Deposition of: Madison T. Rollins

Case Caption: Rollins vs. R Street Institute

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury
that I have read the entire transcript of
my Deposition taken in the captioned matter
or the same has been read to me, and
the same is true and accurate, save and
except for changes and/or corrections, if
any, as indicated by me on the DEPOSITION
ERRATA SHEET hereof, with the understanding
that I offer these changes as if still under
oath.

Signed on the _____ day of

_____, 2023.

Witness name

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE _____ DATE _____

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE _____ DATE _____

CERTIFICATE

Commonwealth of Massachusetts

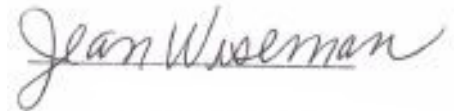
Suffolk, ss.

I, Jean Wiseman, Certified Shorthand
Reporter and Notary Public in and for the
State of Massachusetts, do hereby certify:

That MADISON T. ROLLINS, the witness
whose deposition is hereinbefore set forth, was
duly sworn by me and that such statement is a
true record of the testimony given by the said
witness.

IN WITNESS WHEREOF, I have hereunto set my
hand and seal this 21st day of July, 2023.

My Commission expires 21 May, 2025.



JEAN WISEMAN

THE FOREGOING CERTIFICATION OF
THIS TRANSCRIPT DOES NOT APPLY
TO ANY REPRODUCTION OF THE SAME
BY ANY MEANS UNLESS UNDER THE
DIRECT CONTROL AND/OR DIRECTION
OF THE CERTIFYING REPORTER.

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.